

**UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT OF  
TEXAS HOUSTON DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JACK STEPHEN PURSLEY,

*Defendant.*

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Case 4:18-cr-00575

**DEFENDANT'S FIFTH AMENDED EXHIBIT LIST**

PRESIDING JUDGE: Judge Lynn N. Hughes	PLAINTIFF'S ATTORNEYS: Grace Albinson, Sean Beaty, and Jack Morgan	DEFENDANT'S ATTORNEYS: Victor Vital, Alicia Raines Barrs, and Nicole LeBoeuf
TRIAL DATE: 09/03/2019	COURT REPORTER: Nichole Forrest, RDR, CRR, CRC	COURTROOM DEPUTY:

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
1					12/19/12	Email from Mooney to ddial@www.hgd.com	MA_00037537-00037539
2					05/19/14	Executive Summary to IRS CI by Counsel for Shaun P. Mooney	Mooney-000695-Mooney-000698
3					09/22/14	OVDP	IRS-001725 – IRS-001944
5					11/05/08	Letter from Shaun Mooney to Nigel Tibey	BL- IOMFTL FILE 2-000206 – BL- IOMFTL FILE 2-000220
6					05/19/09	Gillis email to Coughtrey re new matter	Gillis_00022122-Gillis_00022127
7					12/03/14	Shaun Mooney v. Charles Gillis and Gillis, Paris, Henrich, PLLC	Gillis_0000083-Gillis_0000085
8					01/04/13	IRGP v. Mooney, Original Petition	Civ-Lit 000139-000148
9					05/03/13	IRGP Settlement Agreement and Mutual Release	MA_00037564-00037591
14					04/10/18	Gillis Letter of Non-Prosecution (executed by Davis)	MA_00037592 – MA_00037594
17						Work assigned/status	
19						Pursley Individual Master File	IRS-0005044 – IRS-0005072
20					02/23/17	2017 Check from Minns to U.S. Treasury	IRS-002575
21						2014 IRS refund check	MA_00037561
22						2015 IRS refund check	MA_00037562
23						2016 IRS refund check	MA_00037563
24						Picture of Pursley Family	MA_00038603
25						Ron Braver, CV	MA_00038591-38398
26						Stephen Grace, CV	MA_00038540-00038565

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
28					07/21/11	Form 484 Change to Company Details – APHC	MA_00006678 – MA_00006679
29					09/01/09	APHC Share Certificate No. 2	MA_00006623-MA_00006637
30					06/30/10	APHC Financial Report YE June 30 2010	Gillis_00029792 - Gillis_00029800
32					03/04/09	Corporate Meeting Summary	CIV-LIT-000303-CIV-LIT-000307
35					03/27/13	Email from Gillis to Glover	B&T_000344 – B&T_000351
37					04/26/10	Agreement for Sale of Limited Partnership or Assets of Partnership	CIV-LIT-000308 – CIV-LIT-000351
44					08/05/09	Email from Gillis to <a href="mailto:5gloves@ozemail.com.au">5gloves@ozemail.com.au</a>	Gillis_0020835
45					07/24/09	Email from Gillis to <a href="mailto:5gloves@ozemail.com.au">5gloves@ozemail.com.au</a>	
46					08/14/13	Email from Gillis to Coughtrey	Gillis_00048538
48					06/30/09	Email from Gillis to Mooney and Pursley	IRGP0001372
49					06/27/07	Email from Mellor to <a href="mailto:rresalazar@fnslaw.com.oh">rresalazar@fnslaw.com.oh</a>	IRGP0002824
51					06/25/07	Email from Mooney to Nigel Tebay	IRGP0002850
52					08/02/09	Email Gillis to <a href="mailto:5gloves@ozemail.com.au">5gloves@ozemail.com.au</a>	Gillis_00031635- Gillis_00031626
53					07/06/07	Email from Mooney to Pursley	IRGP0003394
55					05/31/18	Tom Foster Interview Recording	B&T_000368
56					06/04/13	Email from Gillis to Venerabile	Gillis_0001497
58					02/22/12	Email from Gillis to Venerabile	UHY.SYD-001237
59					12/21/12	Email from Pursley to Nelson	B&T_000010
60					12/21/12	Email from Mooney to Pursley	B&T_000011
61					08/14/01	Letter from Venerabile to The Directors of Dutton Limited	IRGP0004466 – IRGP0004476
62					04/10/13	Option Contract for the sale of shares in APHC	B&T_000012 – B&T_000014
66					10/29/09	Gillis letter to Pursley re opinion re Federal Income Tax Consequences	Gillis_00020279- Gillis_00020290
67					11/26/18	Declaration of Susan English [ECF 61]	MA_00037294-MA_00037295
68						IRS Refund Check	MA_00037296
69					06/05/09	RPLP Certificate of Formation	TX-SOS-0000282 – TX-SOS-0000283
71					09/14/12	Email from Venerabile to Glover and Gillis	B&T_000018 – B&T_000022
72					08/21/12	Email from Venerabile to Gillis	Gillis_0049471 – Gillis_0049472
73					04/19/13	Email from Venerabile to Glover	B&T_000352 B&T_000365
74					07/25/10	Letter from Gillis to SES Directors	IOMFTL-GPC-0014-000023-IOMFTL-GPC-002-00011
78					04/10/12	Email from Mellor to Gillis	IOMFTL-GPC-0014-000023

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
							IOMFTL-GPC-0014-000025
79					07/30/09	Letter from Venerable to Directors of SES	PURSLEY-002561-PURSLEY-00252
80					00/00/05	Business Development Agreement	MA_00037297-MA_00037300
81					05/06/05	Email from Sholem to Pursley	MA_00037301-MA_00037305
82					09/09/05	Email from Shuman to Pursley	MA_00037306
83					03/13/06	Email from Shuman to Pursley	MA_00037307
84					08/07/07	Email from Shuman to Pursley	MA_00037308
85					09/05/08	Email from Pursley to Shuman	MA_00037309-MA_00037310
86					10/23/08	Email from Pursley to Shuman	MA_00037311
87					11/07/07	Email from Pursley to Shuman	MA_00037312
88					02/01/12	Email from Venerable to Gillis and Mellor	B&T_000023 – B&T_000024
89					04/10/12	Email from Venerable to Mellor and Gillis	B&T_000025 – B&T_000027
90					10/24/11	Email from Pursley to Bratcher	BMA-0000229
91					06/14/13	Email from Bratcher to Pursley	BMA-0000583
92					10/21/11	Email from Richman to Bratcher	BMA-0000585
94					08/13/12	Email from Venerable to Gillis and Coughtrey	B&T_000028 – B&T_000029
95					11/08/12	Email from Venerable to Gillis and Mellor	B&T_000030 – B&T_000032
96					01/17/13	Stoneworth Financial Letter	B&T_000033 – B&T_000036
97					01/26/13	Email from Bratcher to Richman	Bratcher-0004991
98					01/24/13	Email from Bratcher to Richman	Bratcher-0004992
99					06/29/12	APHC Cover Letter to UHY re Financial Report YE June 30 2011	B&T_000037
100					unknown	APHC Director's Declaration	B&T_000038
109					11/11/11	Email from Richman to Pursley	MA_00037338
110					07/19/11	Email Pursley to Salinas	MA_00037339
114					02/27/15	Plaintiff's Notice of Non-Suit	CIV-LIT-000564-CIV-LIT-000566
115					01/19/15	Mooney's Response to Defendant's Request for Disclosure	MA_00001564-MA_00001567
116					08/15/12	APHC Circular Resolutions of Directors	B&T_000047
117						Promissory Note Between Pursley Interest and 4-7s	Bratcher-0001791-Bratcher-0001793
118					07/01/10	Promissory Note between Arosa & IRGP	Bratcher-0000436
119					01/15/11	Promissory Note between Recruitment Partners & Four Sevens Investment Corp	Bratcher-0001796-Bratcher-0001798
120					06/07/10	Promissory Note between Pursley Interest LLC & Four Sevens Investment Corp	000895-000897

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
121					01/13/10	Promissory Note between Recruitment Partners LP and Four Sevens Investment Corp	000923-000925
122					11/19/09	Promissory Note between Recruitment Partners, LP and Four Sevens Investment Corp	000963-000965
123					11/19/09	Promissory Note Recruitment Partners & Four Sevens	Bratcher-0019314-Bratcher-0019316
124					08/31/11	Promissory Note Recruitment Partners & Four Sevens Investment	Bratcher-0019309-Bratcher-0019310
125					07/11/16	Email from Colleen Prince Steve Pursley	MA_00037358-MA_00037360
126						Rental Property Dashboard	MA_00037361-MA_00037362
127						2014 Vacasa Tax Docs Attached	MA_00037363
128					07/21/17	Email from Dana Macik to Pursley	MA_00037365
129						Welcome Package	MA_00037366-MA_00037368
130						Four Sevens Profit Scenario	MA_00037369
131					12/21/12	Email from Pursley to Agee, Betzer and Harris	B&T_000048
133					10/01/09	Pursley Memorandum to Mooney re Progress Report and Advisement	IRGP0005658
134					07/25/10	Letter from Gillis to IOMA attaching minutes	B&T_000051 – B&T_000057
137					09/14/11	Email from Mooney to Pursley	MA_00037494
138					08/26/11	Email from Mooney to Pursley	MA_00037493
139							
140					05/20/11	Email from David Johnson to Pursley	MA_00037491
141					01/20/09	Email from Mooney to Pursley	MA_00037490
142					12/01/08	Email from Pursley to Mooney	MA_00037487-MA_00037489
143					11/14/08	Email from Mooney to Pursley	MA_00037485-MA_00037486
144					11/05/08	Email from Pursley to Mooney	MA_00037484
145					09/04/08	Email from Mooney to Pursley	MA_00037483
146					09/01/08	Email from Mooney to Pursley	MA_00037482
147					07/07/08	Email from Pursley to Mooney	MA_00037481
148					06/27/08	Email from Mooney to Pursley	MA_00037480
150					02/03/08	Email from Mooney to Boone	MA_00037478
151					01/24/08	Email from Mooney to Pursley	MA_00037477
152						Schrader Westchester Real Estate File	B&T_000207 – B&T_000220
153						Jim Miceli real estate file	B&T_000221 – B&T_000254
154					01/02/08	Email from Mooney to Boone and Pursley	MA_00037474
158					11/29/07	Email from Mooney to Pursley	MA_00037467
159					00/00/03	Strategic Negotiation Planning for Acquisition	MA_00037394-MA_00037416
160						Agreement Gulf States and The Westchester Group Inc	MA_00037417-MA_00037418

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161					04/07/99	Melnik letter to IOMFL	BL-IOMFTL FILE 1-000336
162					10/25/07	Email from Kevin Weldon to Mooney	MA_00037466
164					04/14/10	Addendum to Agreement for Sale of Limited Partnership or Assets	B&T_000258
165					06/30/09	Amendment and Revision to RPLP Limited Partnership Agreement	B&T_000259 – B&T_000267
166					04/01/07	Email from Shetter to Mooney	B&T_000268
168					01/28/10	Email from Mooney to Pursley	B&T_000271
169					01/28/10	Email from Mooney to Gillis	B&T_000272
170					04/25/06	Email from Shetter to Mooney	B&T_000273
171					10/03/05	Email from Shuman to Pursley	B&T_000274
175					02/26/06	Email from Shetter to Mooney	Disco ID 124511-1
178					12/24/18	Letter from IRS	B&T_000279 – B&T_000281
179					01/21/10	Email from Gillis to Mooney attaching Mooney resume	B&T_000282 – B&T_000285
180					08/26/10	Email from Mooney to Parkhill	B&T_000286 – B&T_000287
182					05/21/09	Email from Markley to Gillis	B&T_000289 – B&T_000291
190					01/25/10	Email from Mooney to Gillis	B&T_000311 – B&T_000312
191					01/28/10	Email from Mooney to Gillis	B&T_000313 – B&T_000314
192					02/10/10	Email from Mooney to Gillis	B&T_000315
202					07/28/10	Email from Mooney to Gillis	B&T_000331 – B&T_000332
203					03/16/11	Email from Mooney to Gillis	B&T_000333
206					09/30/08	Email from Pursley to Mooney	B&T_000337
208					06/30/09	Email from Pursley to Agee, Betzer and Harris	B&T_000338
209					10/21/11	Email from Richman to Bratcher	MA_00037607-MA_00037609
210					12/19/12	Email from Richman to Mooney	B&T_000339 – B&T_000341
211					10/25/11	Email from Richman to Pursley	B&T_000342
212					02/24/16	England letter to Pursleys	England-01413
213						Statement Regarding Related Party Advances	England-01544
214					01/25/13	Email from Bratcher to Richman	MA_00037341 – MA_00037342
215					01/10/13	Email from Richman to Salinas	MA_00037343 – MA_00037345
216					07/10/09	Gillis Memorandum	IRGP0006113 - 6141
217						Handwritten Notes	B&T_000343
218					03/02/11	Email from Pursley to Salinas	MA_00037350 – MA_00037351
219					02/01/10	Email from Pursley to Bratcher	MA_00037353
220					05/30/12	Richman Memorandum to Pursley	MA_00037357
221					08/27/15	Check to Infinisource	B&T_000366
222					11/04/15	Check to Infinisource	B&T_000367
223						As Amended Form 5471	IRS-0006835 – IRS-0006846
224					05/09/11	Pursley email to Shuman	B&T_000371 - B&T_000372

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
225						Sandy Creek Ranch – Valuation Summary	B&T_000373
226					08/24/14	Mooney v Pursley (Harris County, 2014-44623) Plaintiff's Original Petition and Request for Disclosure	B&T_000374 - B&T_000406
227					12/28/18	Pursley v Mooney v RPLP and IRC (Harris County; 2017-282294) Plaintiff's Sixth Amended Original Petition	B&T_000407 - B&T_000453
228					07/29/11	Salinas email to Pursley attaching general ledgers	B&T_000454 - B&T_000489
229					10/04/11	Salinas email to Pursley attaching Bookkeeping	B&T_000490
231					03/22/10	Salinas email to Pursley	B&T_000763
232					03/11/11	Salinas email to Pursley	B&T_000765
233					03/02/15	Pursley email to England	B&T_000766
234					05/12/15	Pacheco email to Pursley	B&T_000767
235					07/09/15	Christmann email to Pursley	B&T_000768
236					10/01/15	Pursley email to Christmann	B&T_000769
237					02/11/13	Nguyen email to Pursley	B&T_000771
239					12/31/12	Mooney Fraud Risk Inquiries Form	B&T_000863
240					12/31/10	Mooney Fraud Risk Inquiries Form	B&T_000866
241						Handwritten notes	B&T_000869
242					11/04/09	Gillis email to Pursley and Mooney	Gillis_00031417
243					02/27/15	Mooney v Gillis (Harris County; 2014-70310) Order	
244					02/05/15	Pacheco email to Pursley	B&T_000886 - B&T_000894
246					12/31/10	RPLP Audited Financial Statements	Bratcher-0011318
247					12/31/11	RPLP Audited Financial Statements	Bratcher-0018187
248					12/31/12	RPLP Audited Financial Statements	Bratcher-0021576
249					12/31/12	Mooney Fraud Risk Inquiries Form	Bratcher-0021550
250					12/01/11	Stoneworth Financial, LLC letter to Pursley	Bratcher-0021635
251						American Real Estate Properties and Pursley Interests Agreement for Participating Interest	Bratcher-0005056 SC-5
252	001-070				08/17/10	Pursley email to Bratcher	SC-9
253					09/03/09	APHC Meeting Minutes	CG-8 UHY.SYD-000429
254					05/10/09	Foster Memorandum to Pursley	FOSTER-000019 Gov. Ex. 001-035
255	001-045				07/30/09	Venerable letter to Coughtrey	Gillis_00031613
257	003-020				10/31/12	Pursley email to Mellor	IOMFTL-GPC-004-000180

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258	005-037				08/06/12	Venerable email to Mellor	BL-FILE 2-000027
259	008-001				04/17/09	Foster email to Pursley	IRGP0000024
260					02/03/10	Pursley email to Bratcher	MA_00037355 - MA_00037356
261					04/29/09	Foster fax to Pursley	IRGP0000095 - IRGP0000101
262					04/24/09	Foster Invoices	Foster-000111 - Foster-000116
263	008-013				04/24/09	Foster Memorandum to Pursley	IRGP0000052 - IRGP0000053
264					05/07/09	Foster Memorandum to Pursley	MA_00032751 Gov. Ex. 008-016
265	009-015				05/07/09	Gillis email to Pursley	MOONEY-000126 - MOONEY-000127
266					09/00/01	Account Opening Documents for SES Account	RBS/ESC5-001444- 1 Gov. Ex. 013-001
267	017-069				00/00/07	2007 Form 1040X Amended Individual Tax Return - S. Mooney	IRS-0006668 - IRS-0006720
268					08/29/07	SES Fax to IOMA / Mellor	IRGP0003117 - IRGP0003118
269					09/20/01	SES Share Certificates	IRGP0004588 - IRGP0004592
270					04/25/09	Pursley email to Mooney	IRGP0005946 - IRGP0005948
271					09/00/01	SES Corporate Records	IRGP0006713 - IRGP0006812
272					08/25/10	Webb email to Pursley	MA_00038483
273					12/01/10	Mercer email to Pursley	MA_00038512
274					09/11/13	Buschholtz email to Pursley	MA_00038504
275						IRC Marketing Document	B&T_000870
276						Steve Mooney Travel History Excel	
277						Steve Mooney TECS 5pp.	
278						Steve Mooney Travel History 2pp.	
279						Steve Mooney Travel Documents List	
280						David Melnick Travel History Excel	
281						David Melnick TECS i94 Result List 2pp.	
282						David Melnick TECS 34pp.	
283						Shaun Mooney TECS Report 10pp.	Gov. Ex. 163
284						Steve Pursley TECS Report 9pp.	Gov. Ex. 164
285					08/23/14	Venerable email to Pursley	B&T_000871
290					08/17/10	Pursley email to Bratcher	B&T_000882 - B&T_000885
291					05/28/09	Ratification and Indemnification of Corporate Actions of SES for the Formation and Ownership of Pehlambbridge Limited	Pursley-000230
292					06/21/11	Venerable email to Mellor	BL-FILE 2-000017
310						Interest and Penalty Calcs.xlsx	B&T_000927



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311						Historical currency converter with official exchange rates from	B&T_000928
312						IRS-002024 penalty computation	B&T_000929
313					06/30/10	Australian Ptrs 6-30-2010	B&T_000932
314						Penalty Computation	B&T_000941
315						Penalty Computation.xlsx	B&T_000942
377						Additional tax liability foreign source income	B&T_002854
378						Computation of Additional Tax Due and Owing SM - OVDP 2012 - FSI	B&T_002855
379						Computation of Additional Tax Due and Owing SM - OVDP 2012 - Repatriated Income	B&T_002856
380						OVDP Penalty Computation	B&T_002857
381						Tax Interest and Penalty Paid by Shaun Mooney with OVDP	B&T_002858
382						Schedule J computation worksheet	B&T_002859
383						Summary of Tax Liabilities on Foreign Income Tabbed Versions - 8-19-13 Int date.xlsx	B&T_002860
384	001-057				03/08/10	Letter from C. Gillis to the Directors of Southeastern Shipping Company Ltd., Re: Request for Dividend Declaration and Distribution & 2/12/2010 Minutes of Meeting of Australian Partners Holding Corp. Board of Directors	Gillis_00019693 - Gillis_00019695
385	001-066				08/01/10	Promissory Note between Arosa Partners, LLC and Four Sevens Investment Corp.	Bratcher-0000329 – Bratcher-0000331
386	001-076				12/14/12	Email from S. Pursley to G. Bratcher, Re. Follow-Up	Bratcher-0005093 –
387	002-035				10/29/09	Email from A. Mellor to T. Duncan re: E. Venerabile Consulting Scvs Agrmt	BL-IOMFTL FILE 3-000153 – BL-IOMFTL FILE 3-000157
388	002-036				10/30/09	10/30/2009 Email from A. Mellor to T. Duncan, L. Jude, Cc: K. Smith re: E. Venerabile Consulting Scvs Agrmt	BL-IOMFTL FILE 3-000158 – BL-IOMFTL FILE 3-000159
389	002-037				11/04/09	11/4/2009 Email from L. Jude to A. Mellor re: Pelhambridge	BL-IOMFTL FILE 3-000160 – BL-IOMFTL FILE 3-000161
390	002-038				11/09/09	11/9/2009 Email from L. Jude to T. Duncan; A. Mellor re: Pelhambridge, Call w. S. Pursley re Consultancy Agreement	BL-IOMFTL FILE 3-000162
391	002-040				06/17/11	6/17/2011 Email from S. Pursley to S. Pursley re: Enc: 4 Cantos Turismo - Passagem Aerea	BL-IOMFTL FILE 3-000173 – BL-IOMFTL FILE 3-000175
392	002-046				07/09/12	7/9/2012 Email from E. Venerabile to A. Mellor re: Hello Andrew!!!	BL-IOMFTL FILE 3-000189
393	002-056				11/17/09	11/17/2009 Pelhambridge Limited Meeting Minutes & 9/26/2009	BL-IOMFTL FILE 1-000195



DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
						Approved Consulting Services Agreement	
394	002-058				11/13/08	Fax from A. Mellor to S. Mooney re: Diversified Land Holdings, Inc.	BL-IOMFTL FILE 2-000204
395	002-059				03/16/09	Fax from S.E. Shipping to A. Mellor at Pelhambridge re: A. Mellor Visit to the United States	BL-IOMFTL FILE 2-000229
396	002-061				09/05/11	Email from E. Venerable to A. Mellor re: Reminder of Money Transfer to E. Venerable	BL-IOMFTL FILE 3-000183
397	002-067				08/16/12	Email from A. Mellor to T. Duncan re: FW: Southeastern Shipping Company Limited/Dividend	BL-IOMFTL FILE 3-000203
398	002-072				05/01/11	Minutes of Meeting of Pelhambridge Ltd. Board of Directors	BL-IOMFTL FILE 1-000233
399	002-077				10/09/07	Minutes of Meeting Pelhambridge Ltd Board of Directors	BL-IOMFTL FILE 1-000137
400	003-007				03/29/12	Email from E. Venerable to A. Mellor re: Money Transfer to E. Venerable	IOMFTL-GPC-003-000149
401	003-018				09/13/12	Email from G. Glover to C. Gillis and M. Coughtrey re: Dividend Distributions from Australian Partners to E. Venerable	IOMFTL-GPC-004-000139
402	003-021				11/06/12	11/6/2012 Email from A. Mellor to E. Venerable re: Dividend Payment for E. Venerable	IOMFTL-GPC-004-000190
403	003-023				01/25/13	Email from A. Mellor to G. Glover re: APHC Australian Income Tax Information Request	IOMFTL-GPC-004-000227
404	003-024				01/29/13	Email from A. Mellor to G. Glover re: APHC Australian Income Tax Information Request	IOMFTL-GPC-004-000237
405	004-047				09/27/01	9/27/2001 Consultancy Contract between Southeastern Shipping Company Limited and S. Mooney	IRGP0006163
406	004-049				07/10/09	7/10/2009 Email from S. Pursley to K. Smith, re: Miscellaneous Follow-up	MOONEY-000074
407	004-080				04/21/09	4/21/2009 Letter from S. Pursley to S. Mooney re: Waiver of Claims - Southeastern Shipping Company, Ltd.	MOONEY-002302
408	004-086				10/26/12	10/26/2012 Letter to S. Pursley, S. Mooney re AFI Investment	Gillis_00024982
409	004-181				10/22/07	Share Agreement Certificate for Pelhambridge Limited	PURSLEY-004181
411	005-020				03/23/12	3/23/2012 Email from E. Venerable to A. Mellor re: Money transfer to E. Venerable	BL-IOMFTL FILE 2-000024
412	005-035				05/22/12	5/22/2012 Email from E. Venerable to A. Mellor, re: New Wire Transfer	BL-FILE 2-000025
413	005-036				06/12/12	6/12/2012 Email from E. Venerable to A. Mellor, re: New Wire Transfer June 19th	BL-FILE 2-000026

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
414	005-038				08/24/09	Share Certificate for Australian Partners Holding Corp.	Gillis_00020277
415	005-039				09/27/09	Purchase Resolution from Australian Partners, C. Gillis	Gillis_00020426
416	009-011				04/29/09	Email at 11:59 AM from C. Gillis to S. Pursley re: initial draft of stock purchase agreement and with 4/29/2009 draft attached	IRGP0000074
417	009-036				07/09/09	7/9/2009 Email from C. Gillis to "5Gloves" re: Yellow with Pink Polka Dots. Pty Limited	IRGP0001467
418	009-038				07/10/09	7/10/2009 Email from C. Gillis to S. Pursley, S. Mooney re: Subscription Agreement, Attch. Sample Sub.	IRGP0001473
419	009-055				08/06/09	8/6/2009 Email from C. Gillis to S. Pursley, S. Mooney: re: Australian partners Holding Corp. - Capitalisation Issues	IRGP0001874
420	009-061				08/09/09	8/9/2009 Letter from S. Pursley to C. Gillis	IRGP0001934
421	009-069				08/17/09	8/17/2009 Email from C. Gillis to K. Smith and others re: Australian Partners Holding Corp., Attach. 8/17/2009 Letter from C. Gillis to Directors of Southeastern Shipping Company Ltd.	IRGP0002182
422	009-071				08/24/09	8/24/2009 Email from C. Gillis to S. Pursley, Attach. 8/4/2009 Letter from C. Gillis to M. Coughtrey re: Australian Partners Holding Corp.	IRGP0002342
423	009-097					Minutes and Meeting Forms of Diversified Land Holdings, Inc.	Gillis_0052962
424	009-119				12/14/11	12/14/2011 Email from C. Gillis to S. Pursley and S. Mooney re: Internal Revenue Code Section 367 Memorandum	MOONEY-001750
425	009-120				10/21/11	10/21/2011 Email from C. Gillis to S. Pursley and S. Mooney re: Memorandum on Taxation of Foreign Corporations	MOONEY-001765
426	009-130					Australian Partners Holding Corporation Pty. Ltd. Financial Report for year ended 6/30/2011	PURSLEY-006274
427	009-131				03/28/12	3/28/2012 Letter from C. Gillis to Directors of Southeastern Shipping Company Limited c/o IOMA Group - IOMFTL re: Request for Dividend Declaration and Distribution	PURSLEY-006292
428	009-149				04/29/09	4/29/2009 Email from C. Gillis to S. Pursley re: Stock Purchase Agreement With Draft Agreement Attached.	MOONEY-001781
429	009-150				07/10/09	7/10/2009 Email from C. Gillis to G. Glover re: Brazilian Will Invest in US entities	UHY.SYD-004755
430	011-001				06/24/13	6/24/2013 Subscription Agreement for \$500,000 by JSP Interests LLC	HINES-0000509

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431	012-010				11/02/09	11/2/2009 Email from A. Mellor to S. Pursley re Consulting Scvs Agrmt	PURSLEY-008081
432	012-033				09/01/11	9/1/2011 Promissory Note from JSP Interests, LLC to Four Sevens Corp (Unsigned)	PURSLEY-001858
433	015-002				07/29/11	7/29/2011 Four Sevens Investment, Detail General Ledger, Period 1/1/2010 to 12/31/2010	PURSLEY-001838
434	015-004				12/31/10	12/31/2010 American Real Estate Properties Financial Statement	BRATCHER-0000026
435	015-006				12/31/11	12/31/2011 Four Sevens Investment Corp. Adjusted Trial Balance	BRATCHER-0001428
436	015-007				12/31/11	12/31/2011 Four Sevens Investment Corp. Balance Sheet	BRATCHER-0001431
437	015-008				12/31/11	12/31/2011 Four Sevens Investment Corp. General Ledger	BRATCHER-0001454
438	015-009				12/31/11	12/31/2011 Pursley Interests LLC, General Ledger	BRATCHER-0001466
439	015-012				12/31/11	12/31/2011 JSP Interests LLC, General Ledger	BRATCHER-0001480
440	015-013				12/31/11	12/31/2011 Gulf States Management Corp, General Ledger	BRATCHER-0001486
441	015-016				12/31/12	12/31/2012 Four Sevens Investment Corp., Balance Sheet	BRATCHER-0001692
442	015-019				05/26/11	5/26/2011 Letter from G. Bratcher to S. Pursley, re: 12/31/2010 Gulf States Management Corp., Compiled Financial Statements	BRATCHER-0002571
443	015-020				12/31/10	12/31/2010 Gulf States Management Corporation, Trial Balance	BRATCHER-0002657
444	015-022				12/31/12	12/31/2012 Gulf States Management Corp., Balance Sheet	BRATCHER-0002896
445	015-036					Arosa Partners, LLC Financial Documents (2010)	BRATCHER-0000281
446	015-037				08/07/10	8/7/2010 Email from S. Pursley to G. Bratcher re: Agreement AFI Venture, attaching Email from S. Pursley to G. Bratcher re: Agreement AFI Venture (containing draft agreement for participating interest in AFI)	BRATCHER-0005055
447	015-041				03/10/11	3/10/2011 Email between S. Pursley and T. Salinas (Bratcher) re: promissory note for \$910,000	BRATCHER-0000348
448	015-042					Arosa Partners, LLC Balance Sheet (2012)	BRATCHER-0000409
449	015-044					FSIC General Ledger (2012)	BRATCHER-0001768
450	015-047					Pursley Interests LLC Trial Balance (2010)	BRATCHER-0003372
451	015-048					Pursley Interests LLC Balance Sheet (2012)	BRATCHER-0003443
452	015-049					Arosa Partners LLC Trial Balance (2010)	BRATCHER-0003637

DEF. NO.	Former Govt. Ex.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
453	015-053				02/04/10	2/4/2010 Emails between S. Pursley to G. Bratcher re: FSIC investment income	BRATCHER-0005143
454	015-054				04/05/13	Email from S. Pursley to J. Ortega (Bratcher) re: Personal Tax Return Estimate, addresses rental income for Arosa property	BRATCHER-0010730
455	017-026					2014 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.	IRS-0005867
456	017-027					2015 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.	IRS-0005885
457	017-029					2017 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.	IRS-0005917
458	017-030					2015 Form 1120X Amended Corporation Income Tax Return - Four Sevens Investment Corp.	IRS-0005933
459	017-092					2013 Form 1040X - Amended Individual Income Tax Return - S. Pursley (1/6/2017)	IRS-0008170
460	017-094					2014 Form 1040 - Individual Income Tax Return - S. Pursley	IRS-0008227
461	017-095					2015 Form 1040 - Individual Income Tax Return - S. Pursley	IRS-0008265
462	017-096					2016 Form 1040 - Individual Income Tax Return - S. Pursley	IRS-0008328
463	034-004				07/27/09	Change to company details – APHC Changes ownership from Acquisition Partners to Venerable	UHY.SYD-000603
464					10/19/12	Stephen Mooney email to Shaun Mooney re Trip to Atlanta	
465					10/31/12	Stephen Mooney email to Shaun Mooney re Hey man, you in town Thursday?	
466					12/19/12	Stephen Mooney email to Shaun Mooney re Contract / Agreements – for your reference	
467					12/20/12	Shaun Mooney email to Stephen Mooney re Response to your email today	
468					09/01/15	Hamm letter to Steve Mooney re credit card settlement / Federal Express	

Defendant reserves the right to amend its exhibit list as needed prior to and during trial.

Respectfully submitted,

/s/ Victor D. Vital

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**CERTIFICATE OF SERVICE**

I certify that on September 2, 2019, a copy of this document was served on all counsel of record thru filing on the ECF System.

/s/ Victor D. Vital

Victor D. Vital